

Morgan Lewis

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June 28, 2021

Honorable Lewis J. Liman
United States District Judge
United States District Court
Southern District of New York
500 Pearl St., Room 701
New York, NY 10007
limannysd@chambers@nysd.uscourts.gov

Re: Murray v. Church Pension Group Services Corp., 21-cv-02228

Honorable Judge Liman:

Defendant Church Pension Group Services Corp. ("Defendant") writes to respectfully request that the Court postpone the deadline for Plaintiff to file the redacted Complaint scheduled for tomorrow June 29, 2021 until July 9, 2021, and stay the deadline for Defendant to file the redacted Exhibits scheduled for July 1, 2021 until July 13, 2021, pending Defendant's filing of a Motion for Reconsideration of the Court's May 27, 2021 Order on the redactions.

Defendant intends to request that the Court reconsider its request for redactions of paragraph 17 of the Complaint as highlighted in bold text below.

- [REDACTED]
- "In complete disregard of its fiduciary obligations to its Episcopal Church stakeholders, [REDACTED], CIC was fronting premiums in support of another group's [REDACTED]¹ insurance program."

See Complaint, Dkt. no. 1 at ¶ 17.

Defendant believes the above redactions are necessary to protect from public view the alleged opinions of counsel and communications with counsel, which are protected by the attorney client privilege and the attorney work product doctrine. Further, Defendant believes that these redactions are consistent with the Court's prior ruling on redactions in this case.

¹ The Court previously approved the redaction of this figure in its May 27, 2021 Order, for purposes of the public filing it is redacted here. See Dkt. no. 11.


GRANTED. Plaintiff Defendant is ORDERED to file its motion for reconsideration by July 6, 2021 at 5:00 p.m. Plaintiff's response, if any, shall be filed by July 8, 2021 at 5:00 pm.

Plaintiff is ORDERED, by 5:00 p.m. tomorrow, July 1, 2021 to file the complaint with the redactions approved by the Court's Order at Dkt. No. 11, AS WELL AS the additional redactions requested herein, which are approved on a temporary basis pending the Court's review of Defendant's motion for reconsideration.

The endorsement at Dkt. No. 22 was entered in error. The Clerk of Court is respectfully directed to strike it from the record.

SO ORDERED. 6/30/2021

SO ORDERED.


LEWIS J. LIMAN
United States District Judge

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Defendant has made Plaintiff's counsel aware of its intent to file the Motion and Plaintiff's counsel has agreed to the later deadline for the redacted Complaint mentioned above. The Parties have also agreed that during the stay, they will meet and confer on the proposed redactions to paragraph 17 of the Complaint to obviate the need for a Motion.

The Defendant thanks the Court for its consideration.

Respectfully submitted,

/s/ Kimberley E. Lunetta

Kimberley E. Lunetta
Attorney for Defendant